

Message

From: Akly, Christina [Christina.Akly@fpl.com]
Sent: 12/14/2017 4:47:59 PM
To: Marsh, Karen [Marsh.Karen@epa.gov]
Subject: RE: Fugitive emissions at compressor stations under NSPS OOOOa

Good morning Ms. Marsh,

I just wanted to follow up on my email. My main concern at this time is regarding the timeline for leaks repair/resurvey. As explained below, if we conduct a repair/replacement and do not resurvey right away but later (within 30 days of repair) and find at that time that the repair was still leaking, what does that mean in terms of compliance as I would be over the 30 day requirement for repair? And how much longer do I have after that finding to repair the leak and be still in compliance with the rule?

I appreciate your time and help.

Christina Akly

From: Marsh, Karen [mailto:Marsh.Karen@epa.gov]
Sent: Monday, December 11, 2017 9:39 AM
To: Akly, Christina
Subject: RE: Fugitive emissions at compressor stations under NSPS OOOOa

Ms. Akly,

I wanted to let you know that I received your message and am working on providing a response. I hope to provide guidance this week. Apologies for the delay.

Karen

Karen R. Marsh, PE
US EPA, OAQPS, Sectors Policies and Programs Division
Fuels and Incineration Group
109 TW Alexander Drive, Mail Code E143-05
Research Triangle Park, NC 27711
Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Akly, Christina [mailto:Christina.Akly@fpl.com]
Sent: Wednesday, December 06, 2017 4:50 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Subject: Re: Fugitive emissions at compressor stations under NSPS OOOOa

Ms. Marsh,

Thank you so much for your prompt response.

Regarding the repair timeline, I have another question:

If we do a repair 20 days after finding the leak and cannot resurvey it right away, based on your response below, I have 30 days to do the resurvey to check the success of the repair. If we resurvey the repair 15 days after completing the repair (this would be 35 days after finding the leak) and the resurvey shows that the repair was not successful, meaning

that there is still a leak, are we out of compliance at that point and need to report the leak as not being repaired on time? If not, what is my timeline to get the repair "re-fixed" and resurveyed?

On my previous questions, your interpretation is correct, it is two different questions.

The underground piping is buried within the compressor station.

On whether the cracked pipeline is monitored under PHMSA, I'm not sure, I'll check and get back to you. For general purposes, could you provide guidance for either case (PHMSA pipeline and not)? The pipeline would be a pipeline within the compressor station.

I also had another question. For uncontrolled tanks that do not fall under OOOOa (i.e. emit < 6 tpy), thief hatches are not required to be latched or even be part of the monitoring survey, correct?

Let me know if you need any further clarifications.

Thank you so much for your time and help!

Christina Akly

On Dec 6, 2017, at 1:31 PM, Marsh, Karen <Marsh.Karen@epa.gov> wrote:

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Hi Christina,

Thanks for your voicemail and this follow up. I'll provide a response to the most recent questions on repair and then I have some additional questions about your earlier email regarding underground piping and cracked pipes.

Each repair must be completed within 30 days of finding the leak. The resurvey is required within 30 days after making the repair. I understand the confusion and hope this helps.

I wanted to follow up on your earlier questions for additional clarification. It appears you have 2 separate questions: 1) Does underground piping need to be monitored using OGI and 2) Does a cracked pipe have to be repaired under OOOOa repair. Is this a correct interpretation of your questions?

I'd like some clarification on both of these questions in order to determine the correct guidance for you. For the underground piping, are you referring to the pipelines that are at the inlet and outlet of the compressor station? Or are there buried pipelines within the compressor station?

Is the cracked pipe part of a pipeline that is typically monitored under PHMSA? Or is the cracked pipe part of the piping within the compressor station?

I think these clarifications will help me provide some guidance to you quickly.

Thanks!
Karen

Karen R. Marsh, PE
US EPA, OAQPS, Sectors Policies and Programs Division
Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05
Research Triangle Park, NC 27711
Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Akly, Christina [<mailto:Christina.Akly@fpl.com>]
Sent: Wednesday, December 06, 2017 1:17 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Subject: FW: Fugitive emissions at compressor stations under NSPS OOOOa

Good afternoon Ms. Marsh,

I left you a voice message earlier about some questions I have regarding NSPS OOOOa. Ms. Lisa Thompson indicated she forwarded my email below.
In addition to the questions below, I'm not clear about the repair and resurvey timeframes for detected leaks.

1. The rule indicates under 60.5397a(h)(1) that the leak must be repaired no later than 30 days after finding the leak. Under (h)(3) it says that the leak must be resurveyed after 30 days of being repaired. *[(h)(3) Each repaired or replaced fugitive emissions component must be resurveyed as soon as practicable, but no later than **30 days after being repaired**, to ensure that there are no fugitive emissions.]* However, (h)(3)(i) goes on to say: *(h)(3)(i) For repairs that cannot be made during the monitoring survey when the fugitive emissions are initially found, the operator **may** resurvey the repaired fugitive emissions components using either Method 21 or optical gas imaging **within 30 days of finding such fugitive emissions**.*
 - a. We understand that a leak is considered repaired if the resurvey does not show an emission with the OGI camera, Method 21 or soap bubbles (60.5397a(h)(3)(iii) and (iv)), and that such resurvey does not need to be done right after the repair was done, but within a specified timeframe. Our confusion is on the timeframe for the resurvey.
 - b. So the question we have is whether we have 30 days from the day of **finding** the leak or 30 days from the day of **repairing** the leak to resurvey the leak. Provision under (h)(3) reads to me as 30 days after being repaired, but then (h)(3)(i) is confusing because it says 30 days after finding the leak. From the preamble, it would also seem to indicate that the rule was allowing 30 days after being repaired to do the resurvey.

As I mentioned on the call, we need to understand the timeline to ensure we stay in compliance with this rule, so your prompt response will be greatly appreciated.

Thank you!
Christina Akly

From: Akly, Christina
Sent: Thursday, November 30, 2017 10:01 AM
To: 'moore.bruce@epa.gov'
Cc: 'Hambrick.Amy@epa.gov'; 'Thompson.Lisa@epa.gov'
Subject: Fugitive emissions at compressor stations under NSPS OOOOa

Mr. Moore,

I have a question about fugitive emissions monitoring at compressor stations and well sites under NSPS OOOOa that I was hoping you can help me with.

For the fugitive emissions monitoring survey, we need to survey all fugitive emissions components as defined below. For the survey, do we need to include underground piping, i.e. piping components that are buried underground?

Fugitive emissions component means any component that has the potential to emit fugitive emissions of methane or VOC at a well site or compressor station, including but not limited to valves, connectors, pressure relief devices, open-ended lines, flanges, covers and closed vent systems not subject to §60.5411a, thief hatches or other openings on a controlled storage vessel not subject to §60.5395a, compressors, instruments, and meters. Devices that vent as part of normal operations, such as natural gas-driven pneumatic controllers or natural gas-driven pumps, are not fugitive emissions components, insofar as the natural gas discharged from the device's vent is not considered a fugitive emission. Emissions originating from other than the vent, such as the thief hatch on a controlled storage vessel, would be considered fugitive emissions.

Also, if for example, we have a cracked pipe which is identified as leaking during the fugitive emissions survey, would that have to be noted as a leak in the fugitive emissions survey, even though we don't really consider a pipeline a "fugitive emissions component," and would the pipeline leak would have to follow OOOOa repair timeframes? The pipelines would likely have their own inspection schedule and it would have been noted likely during one of those inspections, but it just happened that the fugitive emissions survey was done before and the leak from the pipe was noted then.

I appreciate your time and help.


Thank you!

Christina Akly, Ph.D., P.E.
Senior Environmental Specialist
NextEra Energy, Inc. / Environmental Services
700 Universe Blvd, Juno Beach, FL 33408
Office: 561.691.7065 / Mobile: 352.562.9524

Conference Bridge: 305-552-3001
Participant Code: 343 068 28
Host Access Code: 739 581 28

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